



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

March 24, 2008

Mr. Jim McKenna
Port of Portland & Co-Chairman, Lower Willamette Group
121 NW Everett
Portland, Oregon 97209

Mr. Robert Wyatt
Northwest Natural & Co-Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
Status of Round 3 Sampling Activities

Dear Messrs. Wyatt and McKenna:

The Lower Willamette Group (LWG) has requested documentation from EPA that Round 3B data collection activities at the Portland Harbor site have been completed. EPA concurs that all Round 3B data collection activities associated with the following approved Field Sampling Plans (FSPs) have been completed:

- Round 3B Comprehensive Sediment and Bioassay FSP (conditionally approved on November 9, 2007);
- The Round 3B FSP for Fish and Invertebrate Tissue and Collocated Surface Sediment (approved on December 3, 2007);
- The Round 3 Groundwater Pathway Assessment, FSP for Stratigraphic Assessment and Transition Zone Water Sampling – Gunderson (approved on October 11, 2007);
- The Round 3A Stormwater FSP Addendum (approved November 6, 2007);
- The Round 3 Lamprey Toxicity FSP Addendum (approved August 17, 2007);

The attached Table 1 summarizes the status of all Round 3A and 3B data collection activities. As indicated in the table, there are three outstanding data collection efforts:

The Round 3B Side Scan Sonar Field Sampling Plan: The side-scan sonar data collection effort is primarily for the purpose of debris identification to support the Portland Harbor feasibility

study. The Side-Scan Sonar FSP was submitted to EPA on January 18, 2008. EPA provided comments on this document on March 13, 2008.

The Round 3B Sediment Mobility Study: A proposal for performing sediment mobility testing was submitted on December 11, 2007. EPA provided comments on this proposal on January 24, 2008. A Sediment Mobility FSP is expected on March 24, 2008.

The Collection of Bird Eggs: EPA believes that osprey eggs may serve as a useful long-term monitoring tool following cleanup activities at the Portland Harbor site. EPA also believes that a unique opportunity exists to partner with work being proposed by the Portland Harbor Natural Resource Trustee Council, the United States Geological Survey (USGS) and the U.S. Fish and Wildlife Service. Egg collection and processing will be coordinated with USGS and USFW and will take advantage of existing permits held by USGS for the collection of eggs. Approximately ten bird eggs will be targeted for collection (six to eight nest sites within Portland Harbor with the remainder reference sites located upstream from Portland Harbor but below Willamette Falls). The work to be performed by the LWG would include egg collection and processing support and chemical analysis of the eggs. Egg tissues would be analyzed for selected chemicals including organochlorine pesticides, polychlorinated biphenyls (PCBs), chlorinated dibenzodioxins and furans, mercury and polybrominated diphenyl ethers (PBDEs).

In addition to the above items, EPA and the LWG have not resolved whether lamprey ammocoete tissue analysis is required as part of the water toxicity testing completed in January 2008. Discussion between the EPA and the LWG on this topic is ongoing.

As stated previously by EPA, the data collection needed to support the RI and risk assessment phase of the Portland Harbor RI/FS is essentially complete. Data needs currently being pursued are related to the Portland Harbor FS and the establishment of baseline conditions to support future long-term monitoring efforts. Although EPA does not anticipate any additional data collection to support the RI and baseline risk assessment at this time, the draft RI, baseline risk assessment and/or FS reports may identify additional data requirements that must be addressed to support remedial action decisions at the Portland Harbor site.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Eric Blischke (503) 326-4006. All legal inquiries should be directed to Lori Cora at (206) 553-1115.

Sincerely,

Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: Greg Ulirsch, ATSDR
Rob Neely, NOAA
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